

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

VICTOR BROOKS, )  
                        )  
                        Plaintiff, )  
                        )  
vs.                     )                         No. 08 cv 2417  
                        )  
LISA M. MADIGAN (personally and in her )  
capacity as Illinois Attorney General); )  
MARK ROSS (personally and in his )  
capacity as an Illinois State Police )  
Officer); JOSEPH PONSETTO (personally )  
and in his capacity as an Assistant )  
Illinois Attorney general); EDWARD C. )  
CARTER, III (personally and in his )  
capacity as an Assistant Illinois )  
Attorney general); JORGE L. MONTES )  
(personally and in his capacity as a )  
Member of the Illinois Prisoner Review )  
Board); NORMAN M. SULA (personally and )  
in his capacity as a Member of the )  
Illinois Prisoner Review Board); )  
KENNETH D. TUPY (personally and in his )  
capacity as an employee of the Illinois )  
Prisoner Review Board); and, other )  
Unnamed and/or Unknown Officers, )  
Officials and Employees of the State of )  
Illinois, )  
                        )  
                        Defendants. )

**NOTICE TO PRODUCE**

**TO:** Mr. Allan Abinoja, Esq., Assistant Attorney General  
Illinois Attorney General, 100 W. Randolph St., 13<sup>th</sup> Floor  
Chicago, Illinois 60601

**TAKE NOTICE** that pursuant to the Federal Rules of Civil Procedure,  
Rule 34, you are requested to produce and permit inspection,  
copying, testing, or sampling of the below designated books,  
documents, electronically stored information, or tangible things in

the possession, custody or control of the **ILLINOIS ATTORNEY GENERAL'S OFFICE**, on or before June 23, 2008 ANY AND ALL documents and things, which shall include, but is not limited to, reports, investigations, correspondence, letters, memoranda, drafts, minutes of meetings, diary or appointment book entries, calendar entries, telephone logs, telegrams, telexes, notes (including stenographic notes), agreements, directives, instructions, court papers, legal opinions, staff reports, legal recommendations, staff opinions, research, writings, summaries, briefings, background reports, supplemental reports, expert opinions and reports, news reports (written, audio and video), press releases, press statements, press conferences, newspaper articles, graphic representations, lists of persons or things, books, pamphlets, manuscripts, travel records, statements, transcripts of statements, cancelled checks, mechanical and electronic sound recordings, charts, tapes (sound and video), wordprocessing and computerized information and data, statistical tables and data, memoranda made of any telephonic or electronic communications, diagrams, including e-mails, voicemails, text messages, facsimiles, and other computerized or electronically stored information, relating to the following:

1. Plaintiff, **VICTOR BROOKS** a/k/a **VICTOR E. BROOKS**;
2. Any family members, relatives, friends or associates of Plaintiff, **VICTOR BROOKS** a/k/a **VICTOR E. BROOKS**;

3. **RONALD MATRISCIANO** a/k/a **RONALD S. MATRISCIANO**;
4. Any family members, relatives, friends or associates of **RONALD MATRISCIANO** a/k/a **RONALD S. MATRISCIANO**;
5. Illinois Department of Corrections, Investigations & Intelligence Unit investigation(s) of **VICTOR BROOKS** a/k/a **VICTOR E. BROOKS**;
6. Illinois Department of Corrections, Investigations & Intelligence Unit investigation(s) of **RONALD MATRISCIANO** a/k/a **RONALD S. MATRISCIANO**;
7. Illinois Department of Corrections, Investigations & Intelligence Unit investigation(s) of Inmate **HARRY ALEMAN** T61648;
8. Illinois Department of Corrections, Investigations & Intelligence Unit investigation(s) of Inmate **ANTHONY CLARK** B54434;
9. Illinois Department of Corrections, Investigations & Intelligence Unit investigation(s) of Inmate **JOSEPH BRAVIERI** N83349;
10. Illinois Department of Corrections, Investigations & Intelligence Unit investigation(s) of Inmate **DINO TITONE** N04155;
11. Illinois State Police, Division of Internal Investigation, Case/File # **0300217**, with pages 1-604;

12. Case of *Ronald Matrisciano vs. Roger E. Walker, Jr., et al.*, No. 03-3072, in the United States District Court for the Central District of Illinois, Springfield Division;
13. Proceedings *In re: John Doe Investigation*, SGJ # 2233, before the Special Grand Jury of Cook County, Illinois, February, 2005;
14. Proceedings *In re: John Doe Investigation*, SGJ # 2217, before the Special Grand Jury of Cook County, Illinois, June, 2005;
15. Office of the Attorney General, State of Illinois, Division of Investigations, Investigative Report, Case/File # **AG02-CI-18198**;
16. Case of *People v. Ronald Matrisciano and Victor Brooks*, No. 05 CF 1671, in the Circuit Court of the Seventh Judicial Circuit, County of Sangamon, State of Illinois; and
17. Case of *People v. Ronald Matrisciano and Victor Brooks*, No. 06 CF 458, in the Circuit Court of the Seventh Judicial Circuit, County of Sangamon, State of Illinois.

Respectfully submitted,

BY: /s/ Arvin Boddie  
A. BODDIE, Attorney at Law,  
Attorney for Plaintiff  
**VICTOR BROOKS**

ID No. 6189448  
A. BODDIE, Attorney at Law  
P.O. Box 288910  
Chicago, Illinois 60628-8910  
(773) 928-9551  
(773) 928-9513 [fax]  
[aboddieattyatlaw@sbcglobal.net](mailto:aboddieattyatlaw@sbcglobal.net)

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of this Notice to Produce was served on May 22, 2008, by electronic filing pursuant to Rule XI of the General Order on electronic case filing.

Respectfully submitted,

BY: /s/ Arvin Boddie  
A. BODDIE, Attorney at Law,  
Attorney for Plaintiff  
**VICTOR BROOKS**

ID No. 6189448  
A. BODDIE, Attorney at Law  
P.O. Box 288910  
Chicago, Illinois 60628-8910  
(773) 928-9551  
(773) 928-9513 [fax]  
[aboddieattyatlaw@sbcglobal.net](mailto:aboddieattyatlaw@sbcglobal.net)